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Canterbury City Council Regulation 19 Consultation

Ridlands Farm & Langton Field

CLIENT: Kent County Council and Canterbury City Council
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1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Statement has been prepared on behalf of Kent County Council (KCC) and Canterbury City Council (CCC) in respect of the promotion of land at Ridlands Farm and Langton Field, (herein referred to as 'The Site'), off South Canterbury Road, in Canterbury. These comments are provided as a formal consultation response to the Council's draft Regulation 18 Local Plan (March 2024).
- 1.1.2 The land at Ridlands Farm and Langton Field, was promoted via the previous Local Plan process and is allocated within the Canterbury District Local Plan (adopted July 2017) as Site 10 in Policy SP3 – Strategic Site Allocations.
- 1.1.3 Following a detailed assessment undertaken by the project team, it became apparent that the site allocation shown within the adopted Local Plan needed to be amended to ensure that suitable connections could be made to the external highway network, including for the proposed fast bus route between South Canterbury and the City Centre.
- 1.1.4 Two proposals were therefore submitted under the 2020 Call for Sites process:
- (1) The land at Ridlands Farm & Langton Field to be re-allocated within the emerging Local Plan for up to 420 residential units, (ref. SLAA127), incorporating the provision of a fast bus link between the South Canterbury strategic allocation 'Mountfield Park' and the South Canterbury Road; and
 - (2) The land at Langton Lane to be allocated for up to 15 residential units (ref. SLAA128), to complement the submission for land at Ridlands Farm, to provide access to the parcel and facilitate the proposed fast bus route between South Canterbury and the city centre.
- 1.1.5 These representations follow prior representations submitted in January 2023 in relation to the Council's previous Regulation 18 Draft Local Plan. For the reasons outlined in this Statement and based upon the current national and local planning policy context, including the extant Local Plan allocation, we consider that there remains compelling justification for this site to be allocated for housing to help meet the growing need for new homes in the city.
- 1.1.6 We also note that the site has been included as part of a wider draft allocation with the emerging Local Plan under Policy C6 – Land at Merton Park, which is supported. However, without prejudice to this position, we submit that the site continues to remain available and deliverable in isolation and would bring forward direct benefits in respect of facilitating the fast bus route in the short term.

2 SITE AND SURROUNDING

2.1 OVERVIEW

2.1.1 The site in question comprises two separate parcels of land, known as land at Ridlands Farm and Langton Field, owned by KCC and CCC.

2.2 LAND AT RIDLANDS FARM & LANGTON FIELD



FIGURE 2.1: LAND AT RIDLANDS FARM (GOOGLE EARTH)

- 2.2.1 Land Ridlands Farm & Langton Field is approximately 15.25ha in size, located to the northwest of the B2069 Nackington Road and the south of South Canterbury Road.
- 2.2.2 The majority of the parcel of land is undeveloped and in agricultural use, primarily for arable purposes. A small portion of the land is currently used as a staff car park for the Kent and Canterbury Hospital which is situated to the northeast.
- 2.2.3 There is sporadic tree planting along the western boundary. To the west, the parcel is surrounded by agricultural land, and to the south it is bound by Chaucer Hospital and Simon Langton Grammar School for Boys. To the north is Stuppington Lane, Canterbury Bowls Club, and South Canterbury Road, and to the east is the Kent and Canterbury Hospital site and residential dwellings in Underwood Close.

- 2.2.4 The parcel falls adjacent to an Area of High Landscape Value. In terms of topography, it is relatively flat. According to the Environment Agency Flood Risk Map, the land does not fall within an area of flood risk.
- 2.2.5 The parcel of land is allocated within the adopted Local Plan under Policy SP3 as Site 10 – Land at Ridlands Farm and Langton Field, and is required to provide the following uses:-
- (a) 310 dwellings;
 - (b) Provision of public open space within the site, including play areas; multi-use games area;
 - (c) contributions to primary and secondary school education;
 - (d) community and local facilities to meet local need;
 - (e) health care provision
 - (f) A fast bus link between South Canterbury Road and the South Canterbury strategic allocation (known as 'Mountfield Park').
- 2.2.6 The site also includes land previously safeguarded for health-related development within the adopted Local Plan under Policy QL9.

2.3 LAND AT LANGTON LANE

- 2.3.1 Land at Langton Lane is approximately 0.68 ha in size and is located to the west of the B2068 Nackington Road and the north and east of Simon Langton Grammar School for Boys.
- 2.3.2 The parcel of land is undeveloped and in agricultural use, primarily for arable purposes. It includes the means of vehicular and pedestrian access via Langton Lane.
- 2.3.3 There is sporadic tree planting along the eastern boundary. To the south and west, the land is bound by Simon Langton Grammar School for Boys. To the north is the existing Site 10 allocation (land at Ridlands Farm) and to the east is the Chaucer Hospital.

- 2.3.4 The parcel of land falls adjacent to an Area of High Landscape Value. In terms of topography, it is relatively flat. According to the Environment Agency Flood Risk Map, it does not fall within an area of flood risk.



FIGURE 2.2: LAND AT LANGTON LANE (GOOGLE EARTH)

2.4 SITE SURROUNDINGS

- 2.4.1 The site is located immediately to the south of the Canterbury urban area, in close proximity to a large range of services and facilities within the city, including employment, primary, secondary, and further education, health care, retail, and leisure.
- 2.4.2 The site can be accessed from South Canterbury Road to the north-east, which is subject to a 30mph speed limit.
- 2.4.3 In terms of public transport, Canterbury East Railway Station is located approximately 1km to the north of the site, providing access to regular train services between Dover Priory and London Victoria via Faversham. Canterbury West Station is located approximately 2km to the north of the site, providing access to higher-frequency services between Ramsgate, London Charing Cross, and London St Pancras International via Ashford International.
- 2.4.4 A bus stop located on Nackington Road at the junction with Langton Lane provides access to Route 18 between Canterbury and Hythe and bus stops on South Canterbury Road provide access to Route 25 between Canterbury City Centre and the Kent and Canterbury Hospital.

2.5 PLANNING HISTORY

- 2.5.1 According to the online planning application records held by CCC, there have been no previous applications relating to the site.

2.6 EXISTING ALLOCATION

- 2.6.1 As has been noted, Land at Ridlands Farm and Langton Field is already allocated within the adopted Canterbury District Local Plan (2017) as Site 10 in Policy SP3 and is required to provide the following:
- (a) 310 dwellings;
 - (b) Provision of public open space within the site, including play areas; multi use games area;
 - (c) Contributions to primary and secondary school education;
 - (d) Community and local facilities to meet local need;
 - (e) Health care provision; and
 - (f) A fast bus link between South Canterbury Road and the South Canterbury strategic allocation (known as 'Mountfield Park').

2.7 CALL FOR SITES 2020

- 2.7.1 Following a detailed assessment undertaken by the project team, it became apparent that the site allocation shown within the adopted Local Plan needed to be amended to ensure that suitable connections could be made to the external highway network, including for the proposed fast bus route between South Canterbury and the city centre.
- 2.7.2 A proposal was submitted under the 2020 Call for Sites process, for the land to be re-allocated within the emerging Local Plan, for up to 420 residential units (ref. SLAA127). The revised proposal incorporated the provision of a fast bus link between the South Canterbury strategic allocation 'Mountfield Park' and the South Canterbury Road, in accordance with the existing Site 10 policy requirement, to further enhance pedestrian, cycle, and public transport accessibility between the site and the city centre.
- 2.7.3 The initial appraisal conducted by DHA Transport considered that there was potential for vehicular access to the land from Langton Lane and South Canterbury Road, utilising a separate parcel of land under the control of KCC and CCC; 'land at Langton Lane', should this be required.

2.7.4 A separate Call for Sites proposal was thereby submitted for land at Langton Lane for up to 15 residential units (ref. SLAA128) to complement the submission for land at Ridlands Farm & Langton Field and facilitate the proposed fast bus route between South Canterbury and the city centre, should this be required as an alternative means of access.

2.8 DRAFT ALLOCATION

Merton Park - concept masterplan

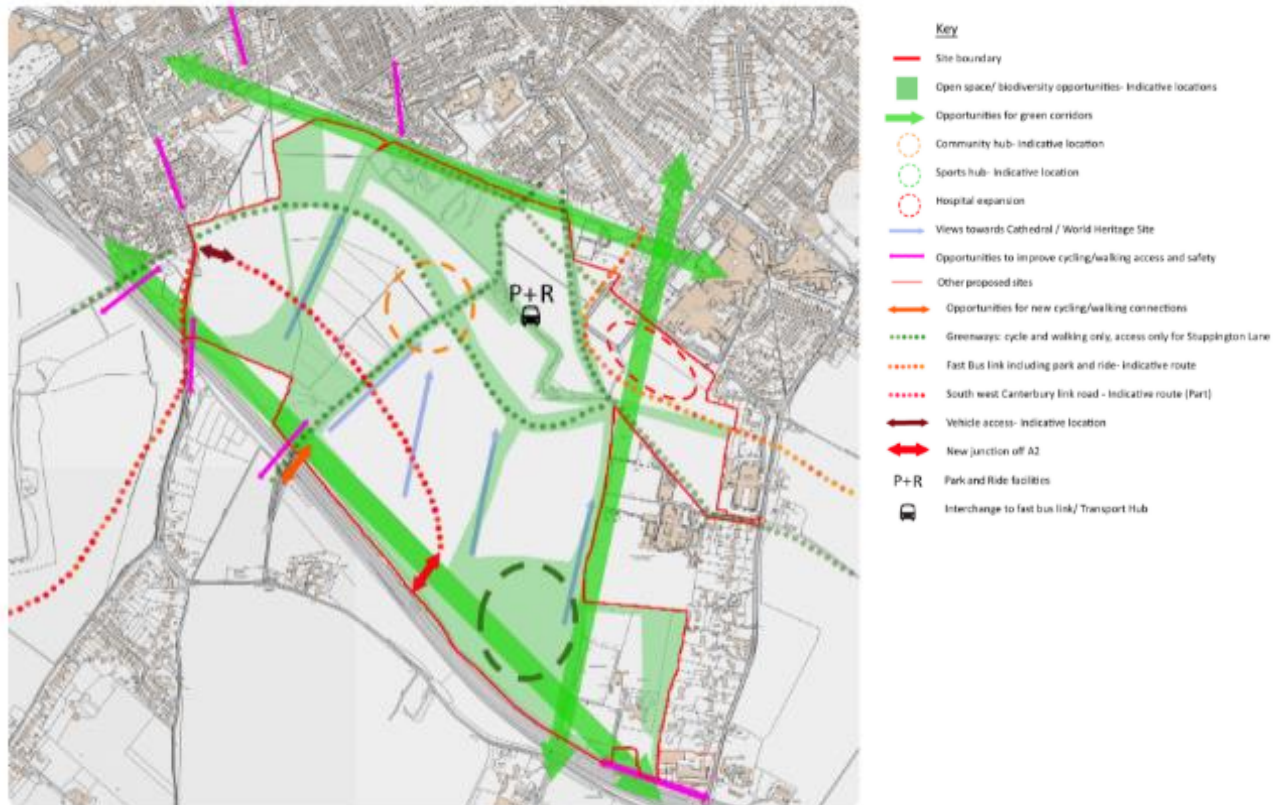


FIGURE 2.3: LAND AT MERTON PARK CONCEPT MASTERPLAN (POLICYC06)

2.8.1 The site is included as part of a wider draft allocation within the emerging Local Plan under Policy C6 – Land at Merton Park. The draft policy requires the following:

- Approximately 2,250 new dwellings, including affordable housing, older persons housing, accessible housing, self-build housing, and an appropriate housing mix in line with the relevant draft policies;
- Provision of a new hospital extension (approximately 6ha);

- Provision of a new sports hub for the City (approximately 6.67ha), including a new and improved rugby club facilities and a new football stadium;
- Provision of a new Park and Ride facility for a minimum of 500 spaces (approximately 1.5ha);
- Provision of a community hub as a focal area for the community including a minimum of 1,500 sqm of commercial, 600 sqm for retail, and 4,000 sqm for business space;
- Provision of a new 3FE Primary School with early years provision (3ha);
- Improvements to the existing Lime Kiln play area;
- Provision of new high-quality wastewater treatment works at an appropriate location within the site, or in combination with Site C7;
- On-site open space in accordance with the relevant policies;
- Provide new access from and to the coastbound A2 carriageway to serve the site and provide vehicular connectivity to Site C7;
- Provide a dedicated fast bus link connecting Nackington Road and South Canterbury Road;

3 PLANNING POLICY FRAMEWORK

3.1 THE NATIONAL PLANNING POLICY FRAMEWORK (DECEMBER 2023)

- 3.1.1 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other developments can be produced. The NPPF is a material consideration in planning decisions.

Achieving Sustainable Development

- 3.1.2 **Paragraph 7** states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 3.1.3 **Paragraph 8** states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).
- 3.1.4 **Paragraph 11** states plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: - (a) "the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (b) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole."

Plan Making

- 3.1.5 As has been noted, **Paragraph 11** of the NPPF emphasises that plans and decisions should apply a presumption in favour of sustainable development. For plan making this means that: -
- (a) *"plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change and adapt to its effects;*
 - (b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: -*

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type, or distribution of development in the plan area 6; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole."

3.1.6 **Paragraph 15** reminds us that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings.

3.1.7 According to **Paragraph 16**, plans should: -

- (a) be prepared with the objective of contributing to the achievement of sustainable*
- (b) development; be prepared positively, in a way that is aspirational but deliverable;*
- (c) be shaped by early, proportionate, and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees;*
- (d) contain policies that are clearly written and unambiguous, so it is evident how a decision-maker should react to development proposals;*
- (e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- (f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."*

3.1.8 The development plan must include strategic policies to address each Local Planning Authority's priorities for the development and use of land in its area (Paragraph 17). Paragraph 20 then states that strategic policies should set out an overall strategy for the pattern, scale, and quality of development, and make sufficient provision for: -

- (a) "housing (including affordable housing), employment, retail, leisure and other commercial development;*
- (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

- (c) community facilities (such as health, education, and cultural infrastructure); and*
- (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*

3.1.9 The NPPF states in **Paragraph 22** that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

3.1.10 **Paragraph 23** states that broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.

3.1.11 **Paragraph 31** states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policy's concerns, and take into account relevant market signals.

3.1.12 Critically, Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound (**Paragraph 35**). Plans are 'sound' if they are: -

- (a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- (b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- (c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- (d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

Delivering a Sufficient Supply of Homes

- 3.1.13 **Paragraph 60** states that in order to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 3.1.14 **Paragraph 61** sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting point for establishing a housing requirement, there may be exceptional circumstances, including those relating to the particular demographic characteristics of an area which justify an alternative approach. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for.
- 3.1.15 Furthermore, **Paragraph 69** states that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability, and likely economic viability. Planning policies should identify a supply of –
- (a) Specific, deliverable sites for five years following the date of intended adoption; and*
 - (b) Specific deliverable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan.”*
- 3.1.16 **Paragraph 70** goes on to stress that small and medium-sized sites can make an important contribution to meeting the housing requirements of an area and are often built out relatively quickly.

Promoting Sustainable Transport

- 3.1.17 **Paragraph 108** states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- (a) "The potential impacts of development on transport networks can be addressed;*
 - (b) Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised for example in relation to the scale, location, or density of development that can be accommodated;*

- (c) Opportunities to promote walking, cycling, and public transport use are identified and pursued;*
- (d) The environmental impacts of traffic infrastructure can be identified, assessed, and taking into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- (e) Patterns of movement, streets, parking, and other transport considerations are integral to the design of schemes, and contribute to making high-quality places.”*

3.1.18 **Paragraph 109** states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focussed on locations that are or can be made sustainable, by limiting the need to travel and offering a genuine choice of transport modes.

3.1.19 **Paragraph 115** states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Achieving Well-Designed and Beautiful Places

3.1.20 **Paragraph 131** states that the creation of high-quality, beautiful, and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work, and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities, and other interests throughout the process.

3.1.21 **Paragraph 135** states that planning policies and decisions should ensure that developments:

- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- (b) are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping;*
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types, and materials to create attractive, welcoming, and distinctive places to live, work, and visit;*
- (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- (f) create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

Conserving and Enhancing the Natural Environment

- 3.1.22 **Paragraph 180** sets out how planning policies and decisions should contribute to and enhance the natural and local environment.
- 3.1.23 With respect to habitats and biodiversity, **Paragraph 186** states that when determining applications, Local Planning Authorities should apply the principles that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- 3.1.24 Equally, proposals that conserve or enhance biodiversity should be supported and encouraged.

Conserving and Enhancing the Historic Environment

- 3.1.25 **Section 16** of the NPPF deals with conserving and enhancing the historic environment.
- 3.1.26 **Paragraph 195** reminds Local Planning Authorities that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

3.2 THE CANTERBURY DISTRICT LOCAL PLAN (JULY 2017)

- 3.2.1 **Policy SP2 – Development Requirements** sets out the current land allocations and development requirements and guidelines, which are set out in the table below:

Development Type	2011-16	2016-21	2021-26	2026-31	Total (2011-31)
Housing Units	2,500	4,500	4,500	4,500	16,000
Employment Land (sqm)	25,000	25,000	23,775	23,000	96,775
Retail	-	-	-	-	-
Comparison Goods (sqm)	0	8,564	11,360	13,876	33,800
Convenience (sqm)	0	0	226	2,342	2,608

TABLE 3.1: LOCAL PLAN DEVELOPMENT REQUIREMENTS

- 3.2.2 To implement the Council's vision for the area, it is recognised that there will need to be a significant increase above the historic levels of development.
- 3.2.3 **Policy SP3** identifies the strategic site allocations to be brought forward in the Local Plan period to 2031. The parameters set out in this policy are the primary objectives for these sites. Those for Site 10 (Land at Ridlands Farm and Langton Field) are as follows: -

Site 10	Development	Amount/Type
Land at Ridlands Farm and Langton Field, Canterbury	Housing	310 dwellings
	Other	Provision of public open space within the site, including play areas; multi-use games area; contributions to primary and secondary school education; community and local facilities to meet local need; health care provision
	Infrastructure	Provision of a fast bus link route from the South Canterbury site to South Canterbury Road

TABLE 3.2: RIDLANDS FARM ALLOCATION POLICY

- 3.2.5 **Policy SP4 - Strategic Approach to Location of Development** highlights that the urban areas of Canterbury, Herne Bay, and Whitstable will continue to be the principal focus for development, with a particular focus in Canterbury, together with development at the rural service centres and local centres.
- 3.2.6 **Policy SP5 - Infrastructure Delivery Plan** states that the Council will prepare an Infrastructure Delivery Plan for the allocations set out in the Plan and will also set out its proposals for the use of Section 106 agreements and similar mechanisms, and the Community Infrastructure Levy.

Housing Development

- 3.2.7 **Policy HD2 - Affordable Housing** states that the Council will seek the provision of 30% affordable housing on all residential developments consisting of 11 or more units, or which have a combined gross floor area of more than 1,000 square metres. The Council's preferred option is for affordable housing to be provided on-site; however, where it can be demonstrated that on-site provision is not suitable, a financial contribution will be sought. The policy goes on to clarify that affordable housing provision below the threshold will need to be justified by the applicant, through the submission of a financial appraisal.
- 3.2.8 In terms of housing mix, **Policy SP2** states that housing types and tenures will be expected to meet the proportions set out in the Council's Housing Strategy. The Canterbury District Housing Strategy 2012-2016 informed the preparation of the Local Plan; however, this was superseded by a Strategic Housing Market Assessment ('SHMA') in the previous Regulation 18 draft plan, however, has now been updated through the Housing Needs Assessment ('HNA') Addendum document published in February 2018

3.3 TRANSPORT INFRASTRUCTURE

- 3.3.1 **Policy T9 - Parking Standards** confirms that the Council will apply the following parking standards to new development. Where provided, cycle parking should be convenient, secure, covered, and where possible complemented by showering and changing facilities.
- 3.3.2 **Policy T17 - Transport Assessment and Travel Plans** states that development proposals considered to have significant transport implications are to be supported by a Transport Assessment and where applicable, a Travel Plan.

3.4 CANTERBURY CITY COUNCIL DRAFT LOCAL PLAN 2020-2045

- 3.4.1 CCC is in the process of preparing a new Local Plan that will manage growth in the district until 2045. They are currently consulting on the revised version of the Regulation 18 draft Local Plan (previous version consulted on in 2022-23), with a view to publishing a Regulation 19 submission draft for consultation between July 2024 and May 2025 ahead of submission to the Secretary of State for examination.
- 3.4.2 The draft Local Plan sees Canterbury continue to be the focus of growth through the period of this Plan as the economic hub of the district. The strategy for Canterbury is to consolidate growth on the southern side of the city, to build on and integrate with planned growth at the 2017 strategic sites at South Canterbury and Cockerling Farm, in addition, a new freestanding settlement on the periphery of the urban area on land to the north of the University of Kent campus is proposed. This will unlock opportunities to deliver significant infrastructure

investment, including an Eastern Movement Corridor and a South West Canterbury Link Road, with direct access to the potential new Kent and Canterbury Hospital.

3.4.3 Policies C6-C10 across the South West Canterbury Strategic Development Area ('SDA') cover five site allocations, which together will deliver (amongst others):

- 54ha of new publicly accessible open space; (1ha less than previous version);
- 6ha of new publicly accessible sports facilities; (0.2ha more than previous version);
- Approximately 3,201 new homes including a minimum of 30% affordable housing and 10% older persons housing;
- Minimum of 8,000 sqm of business floorspace inc. flexible workspace;
- Two new local centres including mobility hubs;
- Two new primary schools;
- A new primary healthcare facility;
- A new sports hub to include new and improved rugby club facilities and a new football stadium;
- The provision of the South West Canterbury Link Road with a new A2 junction and connections to A28 at Thanington;
- The provision of a new 500 space Park and Ride; and
- Creation/enhancements of habitats.

3.4.4 Policy C6 relates to the 'Land at Merton Park' which encompasses both sites considered within these representations. The concept masterplan is demonstrated in Figure 2.1. The draft policy requires the following:

- Approximately 2,250 new dwellings, including affordable housing, older persons housing, accessible housing, self-build housing, and an appropriate housing mix in line with the relevant draft policies;
- Provision of a new hospital extension (approximately 6ha);
- Provision of a new sports hub for the City (approximately 6.67ha), including a new and improved rugby club facilities and a new football stadium;
- Provision of a new Park and Ride facility for a minimum of 500 spaces (approximately 1.5ha);

- Provision of a community hub as a focal area for the community including a minimum of 1,500 sqm of commercial, 600 sqm for retail, and 4,000 sqm for business space;
- Provision of a new 3FE Primary School with early years provision (3ha);
- Improvements to the existing Lime Kiln play area;
- Provision of new high-quality wastewater treatment works at an appropriate location within the site, or in combination with Site C7;
- On-site open space in accordance with the relevant policies;
- Provide new access from and to the coastbound A2 carriageway to serve the site and provide vehicular connectivity to Site C7;
- Provide a dedicated fast bus link connecting Nackington Road and South Canterbury Road.

4 PROPOSED DEVELOPMENT

4.1 OVERVIEW OF DEVELOPMENT SOUGHT

- 4.1.1 Detailed proposals have not yet been advanced for the site, however, indicative proposals were provided in the Call for Sites exercise that included up to 420 residential units on land at Ridlands Farm and up to 15 residential units on land at Langton Lane.
- 4.1.2 Following the previous representations submitted in relation to this site in 2018, the decision to allocate the site for residential development as part of the wider draft allocation 'Land at Merton Park' under draft Policy C6 remains. This is welcomed as previously set out, however, and without prejudice to this position, it is stressed that the site continues to remain available and deliverable in isolation and would bring forward direct and early benefits; notably in respect of facilitating the fast-track bus route provision between Mountfield Park and the City Centre in the short-term. It is not considered that the draft Local Plan has fully taken account of the previous representations submitted in respect of this site.
- 4.1.3 Any future scheme would be subject to early and meaningful engagement with the local community and key stakeholders, including the Council.

4.2 ACCESS AND LOCAL HIGHWAY IMPACT

- 4.2.1 In terms of accessibility, the site is situated within close proximity to a range of existing local services and facilities within the Canterbury urban area. These can be accessed within a short walking distance, via the existing pedestrian infrastructure, as well as by public transport.
- 4.2.2 The site would be accessed from Nackington Road, and the proposal incorporates the provision of a fast bus link between the South Canterbury strategic allocation ('Mountfield Park') and South Canterbury Road, in accordance with the existing Site 10 policy requirement. This will further enhance pedestrian, cycle, and public transport accessibility between the site and the City Centre.
- 4.2.3 There is also the potential for a 'bus gate' feature to be installed within the site to restrict access between Nackington Road and South Canterbury Road to pedestrians, cycles, and buses only.
- 4.2.4 In light of the above, the re-allocation of the land would allow for the prioritisation of sustainable modes of transport, both in relation to this site and the neighbouring Mountfield Park site, and would not result in severe detrimental impacts in transport terms in the absence of the proposed new junction on the coastbound A2.

- 4.2.5 Whilst access from Nackington Road via the reconfiguration of The Chaucer Hospital car park is considered to be the preferred option, subject to the agreement of appropriate commercial terms, these representations also include the Land at Langton Lane as an alternative access route, which has been the subject of previous pre-application engagement with CCC and KCC Highways and Transportation.



FIGURE 4.1: LANGTON LANE ALTERNATIVE ACCESS OPTION

4.3 LANDSCAPE, ECOLOGY, AND LAND CONTAMINATION INPUT

- 4.3.1 The site is presently in the countryside in planning terms but is enclosed by built development immediately to the north, east, and south.
- 4.3.2 The site borders the Canterbury Area of High Landscape Value, which will be considered in detail in any subsequent planning application.
- 4.3.3 The site also has a low degree of tranquillity – the A2 Trunk Road to the west is a busy road, and although not visible from the site, traffic will be heard from within the site, and there is a general awareness of its presence.
- 4.3.4 Vegetation around the site boundaries would be retained and enhanced as part of any development.
- 4.3.5 There would likely be some adverse visual effects for nearby residents and also for users of the PRow which pass through and alongside the site, but such effects are likely to occur with any medium-sized residential development on the edge of a settlement, and most of the views which would be affected already include other residential areas.

- 4.3.6 Any adverse landscape or visual effects arising from the development of the site would be at a relatively low level, would affect a limited area only, and would decline over time as a result of the extensive areas of open space that can be provided within the site.
- 4.3.7 An Extended Phase 1 Ecological Survey will be prepared for submission as part of any application; however, the site is currently subject to a relatively intensive agricultural use and has previously been considered viable for development by the Council.
- 4.3.8 The Environment Act brought in a statutory requirement of 10% Biodiversity Net Gain (BNG) on all major application sites from February 2024 and minor sites from April 2024, therefore any forthcoming application would be supported by a BNG assessment and appropriate metric to address this. It is however noted that draft policy **SS1 (Environmental Strategy for the District)** states that development across the district will need to incorporate measures to deliver a minimum 20% net gain in line with **Policy DS21**, which exceeds the statutory requirement. If CCC wishes to exceed this requirement, then this should be tested and justified for viability purposes. In the absence of any evidence to support a higher requirement than the current legislation requires, this policy is not considered justified or sound.
- 4.3.9 Furthermore, a Natural Environment and Open Spaces Topic Paper (October 2022) and the Climate Change Topic Paper (February 2024) have been added to the Council's evidence base to support the new round of consultations on the revised Draft Local Plan. Neither document provides any evidence to support the requirement for 20% BNG on all sites. Any requirement should be proportionate to the scale of the development proposed, to ensure that development can be viable and fundamentally delivered.
- 4.3.10 Due to the undeveloped nature of the site, contamination is considered a low-risk item, however, the appropriate surveys would be undertaken to inform any planning application coming forward.
- 4.3.11 In summary, whilst there would be some low-level harm in landscape and visual impact terms from the redevelopment of the site, there would be minimal risk in terms of contamination and direct ecological impacts. The appropriateness of Policy SSS1 is questionable at best as to whether a 20% BNG on all sites is viable, and therefore whether sites can be deliverable, however as the site is undeveloped grassland, it is anticipated that at a minimum the statutory requirements could be met.
- 4.3.12 Any such harm is a largely inevitable consequence of the development of a greenfield site, and for this particular site, the harm would be well contained by the edge of the settlement setting.

4.4 NUTRIENT NEUTRALITY

- 4.4.1 The draft Local Plan at **Paragraph 6.50** states that the Council is working with its partners to develop a catchment-wide strategy to deliver mitigation delivery mitigation for the impacts of planned development affecting water quality at the Stodmarsh protected site.
- 4.4.2 The Draft District Nutrient Mitigation Strategy (2024) which forms part of the Council's evidence base sets out a clear sequential approach to embedding mitigation within sites where possible.
- 4.4.3 The draft allocation for the wider Merton Park development (**Policy C6**) requires the provision of a new high-quality waste water treatment works at an appropriate location within the site, or in combination with Site C7.
- 4.4.4 Part 5 (a) of **Policy C6** states that waste water treatment works should be delivered at the earliest possible stage in the development.
- 4.4.5 As set out within these representations, it is the case that the Land at Ridlands Farm and Langton Fields can be bought forward independently and this remains the case in relation to mitigating potential nutrient impacts. Conversations with stakeholders and neighbouring developers have indicated that there could be capacity in their waste water treatment works that the development could connect into should the site be delivered in insolation from the wider allocation.
- 4.4.6 It is expected that full details will be provided as part of any planning application.

4.5 FLOOD RISK AND DRAINAGE

- 4.5.1 The site is located in Flood Zone 1, which is defined as having a low risk of flooding from rivers and sea. There is also a low risk of flooding from other sources (sewer, groundwater, artificial sources, and surface water).

4.6 AFFORDABLE HOUSING POSITION

- 4.6.1 The adopted Local Plan requires affordable housing at a rate of 30%. It is noted that the draft Local Plan maintains this rate, at the following tenure mix:
- (a) 66% for affordable or social rent;
 - (b) 25% First Homes; and
 - (c) 9% other affordable home ownership models.
- 4.6.2 Based on this an opportunity exists to deliver circa 130 affordable homes on the site.

4.7 OPEN SPACE

- 4.7.1 In line with current **Policy DBE8**, forthcoming development proposals for a substantial element of public open space.

4.8 AMENITY CONSIDERATIONS

- 4.8.1 Although the detailed site layout is a matter that would be addressed at the planning application stage, it is accepted that any development would involve a loss of view over this undeveloped agricultural site. However, this is a characteristic of all greenfield site options on the edge of existing settlements.
- 4.8.2 Nonetheless, through appropriate landscaping and design, it can be ensured that development does not have a significant detrimental effect on the residential amenity enjoyed by residents of neighbouring dwellings.

4.9 DELIVERABILITY/AVAILABILITY

- 4.9.1 The NPPF states that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 4.9.2 Having regard to the above context, we can confirm that, subject to reasonable Section 106 contributions being sought, there are no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the Plan period.
- 4.9.3 For reasons set out elsewhere in this Statement, the site is considered suitable for development. Likewise, in respect of suitability, there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution, or contamination.
- 4.9.4 The site is fully within our clients' control. It is noted that the previous representations referred to the safeguarding of land relating to the potential hospital expansion. Whilst it is noted that this is still included in the wider site allocation, central Government announced last summer that the Canterbury Hospital expansion over the Council's land and therefore the land submitted as part of these representations, will not be progressing in the foreseeable future due to insufficient funding. This has been reaffirmed by EKHUFT/NHS and procurement exercises have now been aborted.

4.10 SUMMARY

- 4.10.1 As set out above, there are a number of planning matters that will be required to be addressed as part of the redevelopment of this site. However, none of these are matters that could not be adequately mitigated by high-quality masterplanning, as has been accepted by the Council in making the existing Site 10 allocation in the adopted Local Plan and the C6 draft allocation within the emerging Local Plan.

5 RESPONSE TO DRAFT LOCAL PLAN POLICIES

5.1 INTRODUCTION

- 5.1.1 It is noted that CCC has omitted Policy C5 (South West Canterbury) from the new Regulation 18 documents. Matters contained within this policy previously are summarised in the preamble to Policy C6.
- 5.1.2 Our response to Policy C6 is set out below.

5.2 POLICY C6 – LAND AT MERTON PARK

Q. Do you have any comments on this Policy?

- 5.2.1 As set out within previous representations, we support the general direction of the Local Plan and welcome CCC's decision to allocate the site for residential development as part of the wider allocation 'Land at Merton Park'. This supports our conclusion that the site presents an excellent opportunity to provide housing to meet the growing need for new homes in the city.
- 5.2.2 We would however highlight that the site also continues to remain available and deliverable in its own right, as it does not appear that this has been addressed in the latest version of the Draft Local Plan. The site would be deliverable without significant enabling infrastructure such as the proposed new A2 junction, which would likely take significant time, and we emphasise the direct benefits the scheme would bring forward if delivered in isolation, particularly in respect of facilitating the fast-track bus route provision. As set out above and in our previous Local Plan Representations, Mountfield Park is subject to a maximum cap on the number of dwellings that can be delivered until the fast bus link is provided, therefore, the early delivery of this site is key to enabling ongoing housing delivery in South Canterbury. To date, the scheme has benefitted from access design work and highway pre-application feedback from KCC in order to bring forward the site in isolation.
- 5.2.3 It is considered that this issue, in particular, justifies the approach of differentiating the sites and that releasing the site early and independently would provide a greater level of certainty in respect to early infrastructure and housing delivery, not only on this site but also enabling the continued delivery of housing at Mounfield Park.
- 5.2.4 Furthermore, it is also noted that the indicative location of the Park and Ride has been moved to the western boundary of the site in question, further highlighting the need for the delivery of the land within this control to enable the fast-track bus link.

6 SUMMARY AND CONCLUSION

- 6.1.1 This Statement has been prepared on behalf of Kent County Council (KCC) and Canterbury City Council (CCC) in respect to the promotion of Land at Ridlands Farm and Langton Lane, off South Canterbury Road, in Canterbury.
- 6.1.2 This representation shows that we support the general direction of the Local Plan and welcome CCC's decision to allocate the site for residential development as part of the wider allocation 'Land at Merton Park' under draft Policy C6.
- 6.1.3 We would, however, highlight that the site continues to remain available and deliverable in its own right and emphasise the direct benefits the scheme would bring forward if delivered in isolation, in respect of facilitating the fast-track bus route provision.
- 6.1.4 Our client will be committed to working with the LPA to ensure that the ultimate allocation within the submission version of the Local Plan is deliverable and represents the optimum development solution for the site.